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**From:** Grantham, Nancy [Grantham.Nancy@epa.gov]  
**Sent:** 10/2/2019 8:41:58 PM  
**To:** Glenn, William [Glenn.William@epa.gov]; Hull, George [Hull.George@epa.gov]; Egan, Patrick [egan.patrick@epa.gov]; Quast, Sylvia [Quast.Sylvia@epa.gov]; Miller, Amy [Miller.Amy@epa.gov]; PerezSullivan, Margot [PerezSullivan.Margot@epa.gov]  
**Subject:** RE: Final desk statement re SF NOV, which has been transmitted

Thanks

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**From:** Glenn, William <Glenn.William@epa.gov>  
**Sent:** Wednesday, October 2, 2019 4:41 PM  
**To:** Hull, George <Hull.George@epa.gov>; Egan, Patrick <egan.patrick@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Quast, Sylvia <Quast.Sylvia@epa.gov>; Miller, Amy <Miller.Amy@epa.gov>; PerezSullivan, Margot <PerezSullivan.Margot@epa.gov>  
**Subject:** Final desk statement re SF NOV, which has been transmitted

## Ex. 5 Deliberative Process (DP)

### Desk Statement

The U.S. Environmental Protection Agency has notified the San Francisco Public Utilities Commission that it has identified violations of the City and County of San Francisco's National Pollutant Discharge Elimination System permits regulating discharges from the city's wastewater treatment plants, 36 combined sewer discharge facilities and its combined sewer system, based on inspections and field visits in 2015 and 2016, and subsequently gathered information, such as monitoring data. As the notice explains, the failure to properly operate and maintain the City's sewage collection and treatment facilities creates public health risks. For example, lack of proper operation and maintenance has caused force main and pump station failures that have diverted substantial volumes of raw and partially-treated sewage to flow across beaches and into the San Francisco Bay and the Pacific Ocean. EPA expects San Francisco to share its concern for the protection of public health and surface water resources and to address its ongoing Clean Water Act violations with significant and meaningful measures to ensure a prompt return to full compliance.

The notice of violation can be found at <https://www.epa.gov/ca/city-and-county-san-francisco-npdes-notice-violation-october-2-2019>

Information from EPA's Environmental Compliance History Online

Southeast Plant: <https://echo.epa.gov/detailed-facility-report?fid=110043091301>

Oceanside Plant: <https://echo.epa.gov/detailed-facility-report?fid=110055972023>

National Compliance Initiative: Keeping Raw Sewage and Contaminated Stormwater Out of Our Nation's Waters

<https://www.epa.gov/enforcement/national-compliance-initiative-keeping-raw-sewage-and-contaminated-stormwater-out-of-our>